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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

**MICHAEL BENTON, on behalf of
himself and all persons similarly situated,**

Plaintiff,

vs.

**BBBB BONDING CORPORATION,
CLIFFORD JEFFREY STANLEY,
ROBERT HILL-VENN, and DOES 1
through 50, inclusive,**

Defendants.

Case No.: 2:24-CV-01294-DJC-AC

**STIPULATION AND ORDER RE FILING
OF FIRST AMENDED COMPLAINT
PURSUANT TO F.R.C.P. 15(a)(2)**

STIPULATION TO FILE FIRST AMENDED COMPLAINT

IT IS HEREBY STIPULATED AND AGREED by and between the parties hereto, by and through their respective attorneys of record as follows, pursuant to Fed. R. Civ. P. 15(a)(2) and Local Rules 144, 200 and 220:

1. The parties agree to allow Plaintiff to file and serve a First Amended Complaint which will be amended to add an Eleventh Cause of Action for Violations of the Labor Code – Private Attorney General Act as the required notice period has now expired.


2. Plaintiff shall file a First Amended Complaint together with a complete civil cover sheet within 30 days of the date this Order is entered.

3. The parties agree this stipulation can be executed in one or more parts and by facsimile or electronic copies, each of which shall be deemed an original.

4. The Answer of Defendants BBBB BONDING CORPORATION, CLIFFORD JEFFREY STANLEY, and ROBERT HILL-VENN shall be deemed the Answer to Plaintiff's First Amended Complaint.


DATED: June 17, 2024

LAW OFFICES OF CORREN & CORREN


SPENCER D. SINCLAIR
Attorney for Plaintiff

DATED: June 17, 2024

GARRELL COHON KENNEDY LLP


JEFFREY M. COHON
PETER E. GARRELL
Attorneys for Defendants

ORDER

Pursuant to the stipulation of the parties:

Good cause appearing therefore IT IS ORDERED that Plaintiff is permitted to file and serve a First Amended Complaint within 30 days.

DATED: June 18, 2024

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE